

(I) BACKGROUND INFORMATION: CONSUMER PROTECTION UNITS

There are two units that enforce the provisions of the Colorado Consumer Protection Act (“CCPA”) (Colo. Rev. Stat. §§ 6-1-101, *et seq.*). The Consumer Fraud Unit handles traditional consumer protection matters such as false advertising, Internet marketing scams and charitable fraud cases.

The Antitrust, Tobacco and Consumer Protection Unit handles the Colorado Antitrust Act (“Antitrust Act”) (Colo. Rev. Stat. §§ 6-4-101, *et seq.*), several specialized consumer protection statutes, such as the No-Call List Act (Colo. Rev. Stat. §§ 6-1-901, *et seq.*) and all of the consumer protection laws designed to address mortgage fraud and foreclosure rescue schemes. *See, e.g.*, Colo. Rev. Stat. § 12-61-904.5, 12-61-911 and § 38-40-105 (governing mortgage loan originator conduct), Colo. Rev. Stat. § 6-1-717, (governing appraisal fraud) and Colo. Rev. Stat. § 6-1-1100, *et seq.*, (Colorado Foreclosure Protection Act). This unit also enforces the Tobacco Master Settlement Agreement and related tobacco laws (Colo. Rev. Stat. §§ 39-28-201, *et seq.* – Tobacco Escrow Funds Act; and Colo. Rev. Stat. §§ 39-28-301, *et seq.* – Certified Brands Directory Act). Below is a description of how these units handle their enforcement efforts under their statutory provisions.

Consumer Fraud

Consumer fraud investigations and prosecutions are handled by a variety of attorneys, investigators, and support staff through both Units. While most cases are brought under the Colorado Consumer Protection Act, these Units also bring cases under the Charitable Solicitations Act and the Motor Vehicle Repair Act. In addition to purely local cases, attorneys and staff periodically participate in national or multi-state enforcement activities with their counterparts in the Attorney General Offices of other states and with the Federal Trade Commission.

Antitrust

The Attorney General’s antitrust enforcement efforts are directed at protecting consumers and legitimate competitors from a whole range of anticompetitive conduct, including price fixing, conspiracies to suppress competition and mergers that will unreasonably restrain fair competition. The Attorney General has exclusive jurisdiction to enforce the civil and criminal provisions of the Colorado Antitrust Act. The Attorney General also participates in merger reviews in conjunction with the FTC and DOJ where the industry at issue implicates statewide interests of concern in Colorado.

The Antitrust, Tobacco and Consumer Protection Unit has one full-time lawyer who enforces the Colorado Antitrust Act and the federal antitrust laws. This lawyer is also responsible for enforcement of the no-call laws, discussed below. This position is funded from the general fund.

Tobacco Settlement Enforcement

Since the State’s settlement of the tobacco litigation against the major domestic tobacco companies in 1998, this unit has monitored compliance with the numerous injunctive terms and payment obligations under the Master Settlement Agreement (“MSA”) and the Smokeless Tobacco Master Settlement Agreement (“STMSA”). Under these agreements the companies have agreed to a host of marketing restrictions, including a prohibition on youth marketing. Also under these agreements, the companies pay anywhere from \$80.0 - \$100.0 Million to the general fund of the State of Colorado each year. The fluctuations in payments depend on various complex adjustments provided for under the MSA which relate to sales volume by the participating companies and market share loss to manufacturers that are not part of the MSA (so called, “nonparticipating manufacturers” or “NPMs”).

This unit monitors compliance with the settlement and ensures Colorado's interests are protected in the MSA's payment calculations. This unit also enforces statutes that require NPMs to pay an escrow on their sales that approximates what they would owe under the settlement. The Colorado Department of Revenue (DOR) also has enforcement responsibilities with regard to these escrow requirements, and this unit works closely with DOR on this enforcement. The Antitrust, Tobacco and Consumer Protection Unit has one full-time lawyer who is funded out the tobacco settlement funds to handle these functions.

The "diligent enforcement" arbitration proceedings provided for under the MSA has occupied a significant amount of time for this unit since 2006. Through this arbitration, the tobacco companies can challenge the State's enforcement of the NPM escrow obligations. If it is determined through this arbitration that our enforcement was not diligent, the payment Colorado receives under the settlement can be reduced significantly. After nearly seven years of litigation, Colorado recently received a determination that it diligently enforced the tobacco escrow laws against NPMs. This determination, however, only applies to enforcement undertaken in 2003. While this favorable resolution will likely influence arbitrations for years 2004 – 2012, these proceedings still need to be undertaken to determine the diligence of our enforcement efforts during these years. Work on the arbitrations for these latter years continues and will continue in FY 14-15.

No-Call Enforcement

The No-Call List Act was enacted in 2002. Since that time over 3.4 Million residential phone numbers have been registered on the no-call list. The no-call list and other procedural aspects of the no-call program are administered by the Public Utilities Commission ("PUC"). However, enforcement of violations are handled by one investigator and one lawyer within the Antitrust, Tobacco and Consumer Protection Unit. The lawyer splits his time between this work and antitrust enforcement. The investigator position is funded in part through the fees generated by telemarketers who buy the no-call lists each quarter. The attorney position is funded through general funds.

The Attorney General investigates complaints that are reported to the PUC of suspected no-call violations. These investigations involve some detailed work to ensure that the jurisdictional elements of the No-Call List Act are satisfied. They also involve extensive investigation to identify the suspects or telemarketers involved in the violation. As discussed below, these investigations are labor intensive because violators use calling technologies that make it difficult to trace the calls back to them.

Mortgage Fraud and Foreclosure Prevention

To address the rise in mortgage fraud and foreclosure rescue fraud, the General Assembly passed the Foreclosure Protection Act in 2006 and four mortgage fraud bills in 2007. Also, as part of the 2007 mortgage fraud bills the Antitrust, Tobacco and Consumer Protection Unit was staffed with one lawyer FTE and two investigator FTEs to enforce these new laws and the Foreclosure Protection Act. These three new positions are funded through the licensing fees that are paid by mortgage originators to get licensed with the Division of Real Estate's Mortgage Loan Originator Program.

During FY 13-14, significant resources have been devoted to implementing and monitoring the historic \$25.0 billion settlement with the five major mortgage servicing companies, Bank of America, Wells Fargo, JP Morgan Chase, Citibank and Ally/GMAC ("the National Mortgage Settlement"). This settlement resolved several state and federal claims related to the banks' foreclosure and loan servicing practices. It was the largest settlement reached in a joint federal – state investigation. The federal agencies participating in this settlement were the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, the Consumer Protection Financial Bureau and the U.S. Department of Treasury. Forty-nine state Attorneys General and state banking departments participated in this settlement.

As a result of this settlement the servicing companies agreed to provide at least \$20.0 billion in loan relief to homeowners who are struggling to pay their mortgages. This loan relief can come in the form of reducing the principal balance of the loan in conjunction with a loan modification that will allow a borrower to have an affordable monthly payment. It can also come in the form of refinancing a borrower who is current on the loan, but who has been unable to take advantage of the historically low interest rates during FY 12-13. Credit can also be earned for granting relief that avoids a foreclosure and gets the home back on the market, such as a short sale. The banks also agreed to a detailed 42-page injunction and monitoring plan which regulates the way they conduct foreclosures and handle loan modification requests. One lawyer from this unit serves on the monitoring committee for this nationwide settlement. This activity consumes a significant amount of time and it is expected that this will continue to be the case through FY 14-15 when the settlement expires. Additionally, two lawyers from the unit are engaged in settlements being negotiated with second-tier servicers and monitoring of those settlements.

In addition to this relief, \$51.17 Million in custodial funds were paid to Colorado under the National Mortgage Settlement to help prevent foreclosures and stabilize the housing market. During FY 11-12 this office worked with the Governor's Office, the Division of Housing, the leadership in both the state House and Senate and the housing community to devise a plan to spend this money in a way that will prevent foreclosures and stabilize housing. After holding public hearings and soliciting comments from numerous interested stakeholders this office announced the following funding for existing and new foreclosure prevention and housing stabilization programs:

- ▶ \$24.0 Million for supplemental loan mod programs
- ▶ \$18.196 Million for affordable housing programs
- ▶ \$5.625 Million for housing counseling support over three years
- ▶ \$1.5 Million for Colorado Legal Services over three years
- ▶ \$1.1 Million to the Colorado Foreclosure Hotline for an additional three years of operation and funding for marketing and outreach to distressed homeowners
- ▶ \$750,000 for Colorado Attorney General's Office enforcement and monitoring support

The funding for these programs will continue for three years through FY 14-15. As a result of this settlement this unit has added two contract lawyers, both of whom are funded through the custodial funds recovered in National Mortgage Settlement. One of these lawyers has primary responsibility for monitoring the programs that have been established with the custodial funds. This position will continue through FY 14-15.

The other lawyer works directly with consumers facing foreclosure in an effort to assist them with the loan modification process. This lawyer receives written complaints that these borrowers submit to our office and escalates them to executive level contacts that our office has established with the servicing companies. Each of these complaints is reviewed at the highest levels of the major mortgage servicers. This escalation process afforded these particular homeowners an independent review of their request for assistance. Sometimes as a result of this review, the homeowner obtains relief that they otherwise would not have gotten had they not filed a complaint with our office.

During FY12-13 this unit also continued its mortgage fraud enforcement efforts. Two major enforcement efforts occupied the unit's remaining resources during FY 13-14 and will continue to do so through FY 14-15. First, our office along with DOJ and 17 other state Attorney General Offices have filed consumer protection claims against Standard and Poor's Rating Services, Inc. as a result of its ratings of mortgage-backed securities. *In re: Standard & Poor's Rating Agency Litigation*, Civil Action No. 13-MD-2446 (JMF) (SDNY). This action was consolidated with 14 other state actions in the Southern District of New York, but was recently remanded back to state court. DOJ and the states brought these actions because of the important role that S&P played in the financial crisis. Its ratings were relied upon by investors and the public to assess the creditworthiness of complex securities, such as mortgage-backed securities. DOJ and the states alleged that its conflicts of interests

were allowed to influence its ratings of mortgage-backed securities. These AAA ratings failed to recognize the true creditworthiness of these securities. When the financial crisis started in 2008 these securities were downgraded to junk status. This action is being handled by the mortgage fraud lawyer who is funded from the mortgage fraud funding. Because this case has been set for trial in July 2015 and, consequently, will be the first case to go to trial against S&P, the unit is looking to hire one or two contract lawyers to assist in case preparation.

Second, during FY13-14 our office stepped up the investigation of six law firms and their related companies regarding their foreclosure billing practices. This investigation was commenced in FY11-12. The complexity and number of parties involved has required our unit to add staff. Three lawyers who are funded through the general fund have been assigned to this investigation full-time. In addition, the two mortgage fraud investigators work full-time on this investigation. We have also hired an additional three contract lawyers to assist with this investigation. The contract lawyers are being funded with mortgage fraud custodial funds. We anticipate that this staffing will be necessary through FY14-15 for this matter, as the investigation has resulted in one lawsuit filed so far and may result in additional lawsuits in the coming year.

(II) PRIOR YEAR LEGISLATION

General Assembly passed HB 14-1037 which made it an explicit CCPA violation to sell any product containing synthetic cannabinoids, and increasing significantly the civil penalties for violating this new provision. Bill was signed into law and takes effect on August 6, 2014.

(III) HOT ISSUES

The Antitrust, Tobacco and Consumer Protection Unit will have three major focuses during FY14-15:

1. Bring a successful conclusion to the programs established under the settlement to prevent foreclosures and promote housing;
2. Continue to prosecute the Standard & Poor's litigation; and
3. Continue the investigation into billing practices of Colorado's foreclosure law firms and prosecute the resulting cases.
4. Expansion into more traditional consumer protection areas.

(IV) WORKLOAD MEASURES

Workload Indicators

As discussed in previous budget submissions, quantifiable workload measures are difficult to formulate for the type of consumer protection work that is done by these two units. It is impossible to predict how long any particular litigation will last, or the extent to which a single case will consume unit resources.

Moreover, quantifiable measures such as consumer complaints filed and population growth have been poor predictors of the consumer protection caseload. For example, no-call complaints continue to decrease each year, yet nearly 3.4 Million phone numbers are registered on the no-call list. However, the advent of new calling technology and more diffused telemarketing strategies have actually increased the investigative burden on the no-call enforcement staff. In a similar vein, homeowners who have been sold risky loans through deceptive trade practices, or lost their homes to fraudulent foreclosure rescue scams seldom file complaints with

our office regarding these practices. However, mortgage fraud and foreclosure rescue fraud has accounted for the greatest portion of this unit's work during the past seven fiscal years.

This unit's experience with the foreclosure crisis provides a case-in-point as to why these artificial measures are poor predictors of workload and why they should not be used to set targets or project workload. We have found that our limited resources are best guided by enforcement priorities that respond to current issues that are affecting a large number of consumers, such as the foreclosure crisis. These current issues can arise quickly, such as the robo-signing scandal, which led to the National Mortgage Settlement. Or they can be revealed by a qualitative analysis of complaints. In any event, we have found that being guided by quantifiable indicators such as consumer complaints or population growth are not accurate indicators of workload or the targets that should be pursued.

For these reasons it is difficult to establish benchmarks for enforcement of these laws. In addition, as a prosecutor it would be inappropriate for the Attorney General to set quotas for the number of cases or investigations commenced. Therefore, the benchmarks set in the reports below are not an indication of actual goals. In some instances no benchmarks are set. Rather strategic objectives will continue to guide these units' enforcement priorities.

CORE OBJECTIVES AND PERFORMANCE MEASURES

CONSUMER FRAUD

Objective: Identify and prevent deceptive trade practices in marketplaces affecting Colorado consumers and businesses

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Investigate and either sue or settle with individuals or entities that are engaged in deceptive trade practices	70	55	27	55	60	60

Strategy:

The strategy of both Units continues to be, as it has in the past, to investigate those companies attracting both the largest number and the most discernable pattern of complaints alleging a deceptive trade practice. The consumer intake unit analyzes complaint volume and patterns and regularly communicates to the attorneys within the unit those businesses attracting the most compelling consumer allegations of deceptive advertising and sales practices. The unit also confers with other law enforcement agencies including the FTC, postal service, FBI, and state district attorney's offices to determine what investigations merit the resources of this unit. When investigations confirm the allegations of deceptive trade practices the unit proceeds with prosecution alternatives ranging from voluntary changes to business practices to Formal Assurances of Discontinuance to Complaints for restitution, fines, attorney fees and injunctive relief.

This figure represents investigations and cases that were worked on during FY 14 under the Colorado Consumer Protection Act and Charitable Fraud Act. This figure represents the following actions:

- 38 investigations opened
- 8 settlements, assurances of discontinuance or stipulated final judgments reached in cases, regardless of when they were opened

➤ 9 lawsuits filed

Performance Evaluation: The number of investigations opened and lawsuits filed increased from last year while the number of judgments/settlements/assurances was lower. Significant time and resources were spent this past year on collection of judgments reached last year including the Patterson and Dalbey collections. Enforcement of injunctions obtained in prior years was also a priority with much of Libby DeBlasio's time this past year spent on monitoring and enforcing the Westwood Consent Judgment. In the charitable fraud arena, our default judgment against Adam Shyroch and his breast cancer fraudulent charity was overturned resulting in ongoing prosecution of that matter.

ANTITRUST

Objective: Preserve competition in marketplaces affecting Colorado consumers and businesses by investigating and resolving conduct that is anticompetitive and unreasonably restricts trade in Colorado.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Investigate and either sue or settle with individuals or entities that are engaged in anticompetitive conduct such as price fixing, agreeing to restrain trade or entering into mergers that unreasonably restrict competition	10	9	12	8	10	10

Strategy:

The antitrust enforcement strategy is to leverage our limited resources by participating in investigations and cases with the Department of Justice, the Federal Trade Commission and other state Attorney General Offices. Anticompetitive practices with the most profound impact on Colorado residents are usually perpetrated by companies operating on a nationwide basis. With just one antitrust lawyer who also splits his time on enforcement of the no-call laws, this unit can leverage our enforcement efforts by coordinating with other state and federal antitrust enforcement agencies. This strategy allows us to take on those practices that have widespread harm within the state and across the nation. This strategy will continue to be used, but we will also make increased efforts where possible to identify and investigate local antitrust issues.

Performance Evaluation:

As a result of this strategy we were able to fulfill our goal of providing protecting for Colorado consumers by leveraging limited resources. The e-books lawsuit provides a good example as to the effectiveness of this strategy. In April 2012 Colorado, along with 32 state Attorney General Offices, filed suit against five publishers and Apple for price fixing on best-selling books that are distributed electronically and read by consumers on tablets or other electronic devices. This is a nationwide practice that Colorado could not handle on its own with just one attorney. This strategy has resulted in \$166.0 million in settlements with five publishers, and resulted in a finding that Apple participated in this price-fixing conspiracy and a pending \$400.0 million settlement with Apple.

The figure reported for FY12-13 reports the number of cases investigated, litigated or brought to resolution through settlement or judgment. They include traditional investigations of anticompetitive conduct, such as price fixing and agreements to restrain competition. They also include reviews of mergers that threatened to reduce competition. These activities are broken down as follows:

- The trial and finding entered against Apple in which the court concluded that Apple conspired with eBook publishers to raise the price of eBooks.
- 3 investigations opened to conduct that may be anticompetitive
- 8 settlements reached, including 5 with the publishing companies that conspired with Apple to raise the price of eBooks. These settlements resulted in \$166.0 million to consumers nationwide.

TOBACCO

Objective: Ensure that the Master Settlement Agreement continues to protect consumers and fair competition in the tobacco industry by enforcing the anti-youth marketing and honest advertising requirements contained in this agreement and protecting the payments owed to Colorado under this settlement.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Participate in MSA proceedings to ensure that proper payments are made under the settlement to	12	13	12	19	12	12
Diligently enforce the tobacco laws requiring escrow payments by NPMs and certification of compliant brands by all tobacco manufacturers	85	95	85	89	85	85

Strategy:

The strategy for tobacco enforcement is to protect Colorado's settlement payments under the MSA. This is composed of two main functions. The first is to ensure that Colorado's diligent enforcement efforts are presented in the multistate arbitration that is currently pending with regard to the nonparticipating manufacturer (NPM) adjustment.

The other strategy that this unit employs to protect the MSA payments is to diligently enforce the tobacco escrow and certification laws relating to the MSA. Under these laws, an NPM must make certifications as to its sales in Colorado and pay an escrow equivalent to \$0.029 per cigarette. In addition, all tobacco manufacturers regardless of whether they are NPMs or parties to the MSA must certify the brands that they intend to sell in Colorado. If certified, the brands are published on a certified brands directory. This certification process provides an effective way to ensure compliance with the MSA, and therefore, protect Colorado's payment under the MSA.

Performance Evaluation:

In FY 12-13, Colorado participated in the NPM Arbitration hearings and had its own state-specific arbitration. The arbitration panel determined that Colorado was diligent in the enforcement of its tobacco

escrow laws against the NPMs and that our office had a “culture of compliance”. This positive result is likely to influence the arbitrations in later years. This positive result also means that Colorado’s payment will not be reduced for the 2003 sales year and bodes well for protection of our payment in later years.

The number reported in table #1 represents participation in proceedings that are conducted under the MSA for the processing of payments. This number has held steady for the last two fiscal years. Most of the work, however, is related to the diligent enforcement proceedings.

With regard to certification review, this unit has met our goal of reviewing each escrow certification and certification made for the certified brands directory in a timely manner. The numbers reported in table #2 represent certifications reviewed and other enforcement efforts to ensure NPM compliance. This number has declined because the number of NPMs selling cigarettes in Colorado has declined over time. The certifications are then published to all retailers and provide them with up to date information about brands that may be sold in Colorado. By timely reviewing these certifications and publishing them to retailers, we are able to deter the sale of unauthorized brands in Colorado. This measure has proven to be an effective way to ensure that only compliant brands are sold in Colorado. This control measure in turn protects the MSA payments to Colorado.

No-Call

Objective: Ensure that residential privacy is protected by actively enforcing the Colorado No-Call List Act.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Identify telemarketers who are responsible for the most number of violations and take immediate action to bring them into compliance with the No-Call Act.	24	19	15	14	24	24

Strategy:

No-call enforcement continues to be a challenge as a result of telemarketers that use calling technologies that conceal their location and telephone numbers. The most common no-call violations are committed by companies that are located in other states and even outside of the country. They telemarket on a nationwide basis. They use auto-dialer devices that do not scrub calling lists against the no-call list. They use calling technologies that conceal the identity of telemarketers and make it difficult to trace the call back to them.

To identify these violators our strategy had been to use traditional investigative techniques to trace these calls back to the telemarketer. This enforcement approach is labor intensive. It requires the issuance of numerous subpoenas to local telecom carriers, Internet service providers and financial institutions to identify the particular telemarketer originating the calls. We have also coordinated information sharing among other state Attorney General Offices and the FTC.

Despite our best efforts, we have been unable to make a meaningful difference in stopping unwanted calls by telemarketers who are located out of state or out of the country and who are using these call-masking techniques. Our office is not alone among law enforcement agencies across the country having this same problem. The FTC held a robo-call summit on October 18, 2012 to discuss this issue. See

<http://www.ftc.gov/opa/2012/10/robocalls.shtm>. Our office attended, along with interested telecom stakeholders. The focus of the summit was to identify alternative ways to identify and stop these violators. The FTC even offered a \$50,000 reward to contestants who submitted creative ideas for stopping these calls. See <http://www.ftc.gov/opa/2012/10/robocalls3.shtm>.

In FY13-14 this office is changing its enforcement strategy. First, we are going to focus on text message complaints. This is a common occurrence and we are working on a system to collect complaints about these violations. We are also participating in a coordinated law enforcement effort to stop cramming of unauthorized charges on wireless bills. Common unauthorized charges generally arise out of free offers for new ring tones or daily horoscope texts. Third, we are going to focus on violators who we can quickly identify. We have adopted a strategy to quickly identify them and then stop their calls. These violators usually operate for a limited time and on a small scale. While these violators account for approximately 10% of our complaints, stopping these telemarketers will at least reduce the number of unwanted calls. Additionally, the unit has taken measures to issue more subpoenas on a regular basis by regularly reviewing the no-call complaint database and issuing subpoenas to both the national and local top complaint-getting numbers on a bi-monthly basis.

Finally, our investigator is working with James Sidanycz to create a legislative “wish list” for the no-call statute to help improve enforcement ability. We are also hoping to bring the no-call complaint database in-house this year.

Performance Evaluation:

Unfortunately the strategy discussed above has not resulted in less unwanted calls. This is a problem common to other law enforcement agencies nationwide. This has caused a shift in our enforcement strategy, as discussed above.

MORTGAGE AND FORECLOSURE RESCUE FRAUD

Objective: Preserve and stabilize home ownership in Colorado by helping delinquent borrowers save their homes from foreclosure and preventing exploitation of homeowners in foreclosure.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Enforce the mortgage fraud and foreclosure rescue fraud laws in order to protect a borrower from foreclosure or unfair loan terms.	140	138	15	416*	NA	NA

*The vast majority of this number is the amount of foreclosure-related complaints we escalated to mortgage servicer during FY 13-14. It also accounts for larger investigations into mortgage fraud-related complaints.

Strategy:

As discussed in last year’s budget submission this unit is pursuing a new strategy that is focused on alleviating the foreclosure crisis in Colorado. This new strategy is designed to prevent unnecessary foreclosures. The National Mortgage Settlement has put in place the financial incentives, injunctive terms and state-level funding that has allowed us to pursue this new strategy. Therefore, during FY 12-13 through FY14-15 this unit will focus more on running programs to prevent foreclosure and less on enforcement actions against entities violating the mortgage fraud and foreclosure relief laws. As stated in last year’s

budget narrative, this unit will employ three strategies to try to avoid foreclosure and the rescue scams that prey on homeowners trying to save their homes.

1. Actively monitoring the National Mortgage Settlement to ensure that relief is provided to homeowners in need. Our office serves on the monitoring committee which is tasked with working with the settlement monitor to ensure that the major mortgage servicers are following the requirements necessary to evaluate a modification request and provide meaningful relief to struggling homeowners.
2. Participate in negotiations and monitoring of settlements with second-tier services such as Ocwen, SunTrust and NationStar.
3. Implement and fund the settlement programs that are designed to help borrowers avoid foreclosure.
4. Continue to devote one full-time staff to escalate complaints to the major mortgage servicers in FY 13-14. As foreclosures continue to decline and the servicing companies improve their systems for assisting delinquent borrowers an assessment will be made as to the need to continue this position in FY 14-15.

Performance Evaluation:

The National Mortgage Settlement and our Colorado-specific programs have helped alleviate the foreclosure crisis and stabilize the housing market during FY12-13. The Colorado Division of Housing reports that foreclosures are at their lowest point since 2007. In addition, Metro Denver area housing prices have recovered to their pre-financial crisis peak set in July 2006.

<http://www.divisionofhousing.com/2013/08/case-shiller-metro-denver-home-price.html#.UkmlNtznUL>.

The National Mortgage Settlement and Colorado-specific programs have helped contribute to these positive results. Below are the results of the National Mortgage Settlement and related programs during FY 12-13:

1. Loan Relief Granted under the National Mortgage Settlement: The settlement has delivered loan relief in the amount of \$425.0 Million to 7,500 homeowners in Colorado. This relief means that there were 7,500 less foreclosures because of the settlement in FY12-13. This nearly doubles the amount of relief that we estimated at the outset of the settlement. Nationwide over \$51.0 Billion in loan relief has been granted to 643,726 borrowers. Again, this represents a significant number of foreclosures avoided nationwide as a result of this settlement.
2. Affordable Housing Gains: The foreclosure crisis has created an expensive rental market as homeowners leave their homes for rental housing. The Division of Housing also reports that vacancy rates are at historical lows and that rental rates are at an all time high. http://www.divisionofhousing.com/search/label/vacancy%20surveys#.UkdC_9znaUk. As a result of this situation, the Attorney General provided just over \$13.1 million to the Colorado Division of Housing to offer funding that would stimulate the construction of more affordable rental housing. As a result of this funding 900 affordable housing units have been preserved or created in Denver, Loveland and Ft. Collins. An additional \$5.0 Million has been provided to repurpose Ft. Lyon as a residential treatment and housing facility for homeless veterans. As a result of this funding, the Division of Housing has been able to retrofit Ft. Lyon. Residents started to be admitted in September 2013, just in time to provide some help with those displaced by the flooding. It is anticipated that up to 300 homeless veterans will be housed at Ft. Lyon and receive treatment there.
3. Supplemental Loan Programs: The Attorney General established two loan funds with \$24.0 million to provide relief to homeowners who don't qualify for relief under the National Mortgage Settlement. Both of these loan programs got up and running in late 2012 and early 2013. We are still working with the major servicers to get them to recognize these assistance programs. But so far with limited

participation of the servicers these programs have provided assistance to 27 homeowners. We will work with the major servicers to get them onboard with these programs throughout FY 13-14.

4. Housing Counseling Support: The Attorney General committed just over \$5.6 million to increase the availability of housing counseling throughout Colorado. These housing counselors are HUD approved nonprofit counselors who charge nothing for their services and can provide expert advice to homeowners. Four out of five homeowners who contact a counselor are able to save their home or work out an arrangement that avoids a foreclosure. This free service is the best way for struggling homeowners to get assistance. It also provides an alternative to the loan mod and foreclosure relief scams that prey on vulnerable homeowners.

As a result of this funding, 18 housing counseling agencies have been able to expand their services to homeowners across the state. In particular five agencies have received rural expansion funding which has resulted in coverage of areas that had limited service or had previously not been served, including the counties of Archuleta, Garfield, Delta, Montrose, Moffat, Rio Blanco, Crowley, Otero, Bent, Teller, Chaffee, Lake and Gunnison. Overall 182 households have received counseling as a result of this increased funding.

5. Colorado Foreclosure Hotline: The Colorado Foreclosure Hotline is a service that was founded in 2006 in response to the foreclosure crisis. Homeowners who are in need of assistance call the hotline and are connected with a nonprofit, HUD approved housing counselor. Of the additional \$1.1 Million provided to the hotline, \$600,000 is for continued operation of the hotline through FY 14-15. The other \$500,000 is used to increase marketing of the hotline. As a result of this extra funding the hotline undertook two significant marketing initiatives in FY 12-13 and promoted grassroots awareness in areas hit hardest by the foreclosure crisis. This extra funding increased call volume, which translated directly into free help for homeowners struggling with their mortgages.
6. Colorado Legal Services: In FY 12-13 Colorado received the first of three \$500,000 grants to support servicers for homeowners who are in foreclosure or in default on their loans. As a result of this funding CLS has been able to expand legal aid services to homeowners across the state. CLS added lawyers in Denver, Grand Junction, Ft. Collins, Greeley, Pueblo and Colorado Springs to provide free legal services to clients who qualified for representation. In FY 12-13 CLS also launched a statewide tollfree assistance line and provided representation to 318 clients.
7. Attorney General Escalation Program: The \$750,000 retained by the Attorney General's Office has allowed us to hire a full time lawyer to review mortgage fraud complaints and determine which ones to escalate to the servicing companies. In FY 12-13 1,745 complaints have been filed and 626 were escalated to the servicing companies.

D) BACKGROUND INFORMATION: CONSUMER CREDIT UNIT

This Unit enforces seven state laws relating to consumer credit and debt collections. As of July 1, 2014, it has a combined FTE total of 20 consisting of 4 attorney positions and 16 classified staff positions.

Consumer Credit:

The Consumer Credit unit enforces the Colorado Uniform Consumer Credit Code (UCCC) (consumer lending); Uniform Debt Management Services Act (credit counseling and debt settlement); Credit Services Organization Act (credit repair), Rental Purchase Agreement Act (rent-to-own), and Refund Anticipation Loans Act.

UCCC: The UCCC protects the rights of consumers who borrow money, establishes reasonable limits on interest rates and fees, fosters fair competition among lenders, and promotes an adequate supply of credit. The UCCC, title 5 of the Colorado Revised Statutes, includes articles establishing the Colorado Consumer Equity Protection Act (restricting certain terms in high-cost loans), Deferred Deposit Loan Act (payday loans), and the Refund Anticipation Loans Act and Rental Purchase Agreement Act, both described below. The unit licenses and examines lenders who make high-rate loans – defined as loans with an annual percentage rate of more than 12%, including deferred deposit or “payday” lenders – and as of January 1, 2010 may examine retailers that extend credit and sales finance companies that collect credit contracts. These retailers must file an annual notification form. There is an advisory board – the Council of Advisors on Consumer Credit. The UCCC contains a licensing exemption for residential first mortgage acquisition and refinance loans.

Debt Management: Debt management companies act as an intermediary between an individual and creditors to obtain concessions such as reduction of interest, waiver of fees, etc. The law regulates both traditional credit counseling companies that distribute periodic payments to creditors, and debt settlement companies that attempt to negotiate with creditors to settle a debt for a lesser amount. Companies that enter into contracts with Colorado consumers are subject to strict regulation including registration, bonding, insurance requirements, fee limitations, and contract and disclosure requirements. The unit conducts compliance examinations and investigates complaints.

Credit Repair and Rent-To-Own: Companies that engage in credit repair contract with consumers to remove old and inaccurate information from credit reports. The law requires written contracts and disclosures and prohibits advance fees. There are no licensing, registration, or compliance examination requirements. The unit investigates complaints. Complaints typically increase during economic downturns. The Rental Purchase Agreement Act regulates rent-to-own companies who lease goods to consumers with impaired credit. Payments are due weekly or monthly. The consumer may continue to make payments and eventually own the items or stop payments and return the items at any time. Fees and costs are higher than retail sales. There is no licensing or registration. The unit investigates complaints and may conduct compliance examinations.

Refund Anticipation Loans: The RAL Act requires companies that facilitate short-term tax refund anticipation loans to make written and oral disclosures, including that the products are loans, the fee schedule, sample loan fees and interest rates, and other tax filing alternatives for quick refunds without incurring fees.

Debt Collection:

Colorado Fair Debt Collection Practices Act: This unit enforces the Colorado Fair Debt Collection Practices Act (CFDCPA) – the state’s law on consumer debt collection. The law protects businesses that place accounts for collection and protects consumers contacted by collection agencies. This ensures that all collection agencies act in compliance with the law and there is no unfair competition. The unit licenses collection agencies, investigates complaints of unlawful activity, and takes administrative discipline against collection agencies that violate the law. There is no statutory authority to conduct compliance examinations without cause to believe a violation of the law has occurred. There is an advisory board with members appointed by the governor.

Colorado Child Support Collection Consumer Protection Act: This law specifically governs collection of child support by private collection agencies contracting with custodial parents (not governmental agencies). In addition to incorporating most of the CFDCPA’s provisions, including licensing, the law provides additional protections applicable to child support collection.

II) PRIOR YEAR LEGISLATION

There was no legislation in the prior session affecting any of the acts that the Consumer Credit Unit enforces or regulates.

III) HOT ISSUES:

Consumer Credit:

- The economic situation continues to impact the consumer credit area. Compliance examinations and consumer complaints have been focused on delinquency, defaults, repossessions, debt purchasing, debt settlement, and collection practices. The number of licensed lenders is expected to be flat as lenders continue to limit the number of direct loans made to subprime borrowers.
- Since January 1, 2010 when unit staff began to examine creditors and sales finance companies that file notification on a regular basis, compliance examinations have taken more time. This is the first compliance exam for many companies, they appear to be unfamiliar with detailed compliance and the examination process, and records are not in good order resulting in slower examinations. Refunds related to

these examinations may have decreased as a result of the educational outreach and more familiarity with applicable rates and fee limitations.

- Enforcement of the Debt Management Services Act continues to take substantial resources. The law is detailed and compliance examinations reveal compliance problems. More importantly, many companies ignore the law or test its exemptions. More than half of the unit's pending litigation involves DMSA cases.
- Significant unit resources have been focused on legal action and investigations involving unlicensed internet payday lenders and claims that loans are made by arms of Native American Indian tribes asserting tribal sovereign immunity.
- The federal Consumer Financial Protection Bureau has been in operation since June 21, 2011 and has federal supervision and regulatory authority to enforce federal law over many of the same non-depository financial industries that the unit regulates – specifically payday loans, private student loans, and some mortgage loans. It will also have supervisory authority over larger market participants in other credit areas and enforcement authority over all consumer credit products. The unit has been involved in joint investigations and enforcement efforts with the Bureau related to various types of consumer credit including student loans, online lending, debt collection etc. The unit is also part of several working groups with the CFPB dealing with policy and regulatory issues.

Debt Collection:

- The positive turn in the economy has resulted in slightly fewer number of new license applications and due to a number of collection agencies surrendering their licenses due to mergers or acquisitions or cessation from business, there is a small decrease in total licensees. Tougher federal regulations on the sale of defaulted credit card debts and more state enforcement actions against debt purchasers may have attributed to the decline in the number of collection agencies keeping their existing licenses or applying for new licenses. However, the negative economic environment which preceded fiscal year 2014 appears to not have diminished debt collection activity as shown by a 15% increase in the number of consumer complaints.
- The unit continues to monitor and investigate the nationwide problems with the collection of old debt, e.g. collecting on cases beyond the statute of limitations and inadequate proof of debt problems.
- The unit is currently involved in investigations of collection agencies that purchase and collect large portfolios of defaulted consumer debt from banks or credit card companies. The issues in these cases is the use of “robo-signed” affidavits to validate the debt and attempt to collect on the debt from the consumer and/or for filing in default judgments against consumers.

- The CFPB issued an Advanced Notice of Proposed Rulemaking requesting comments on proposed rules regarding debt collection practices and the debt collection system. The unit anticipates analyzing impact of such rules on the industry and the administration of the Colorado FDCPA.

IV) WORKLOAD MEASURE:

WORKLOAD INDICATORS

Consumer Credit						
Workload Measure	Unit	FY12 Actual	FY13 Actual	FY 14 Actual	FY 15 Estimate	FY16
New Licenses Issued (UCCC)	Number	140	95	92	110	120
License Total on June 30 (UCCC)	Number	745	735	742	750	775
Notifications Filed (Credit Sales, Sales Finance, Rent-to-Own)	Number	1433	1379	1435	1450	1500
New Registrations Issued (Debt Management)	Number	4	4	2	5	5
Registration Total on June 30 (Debt Management)	Number	49	48	45	50	50
Written Complaints Received (UCCC, CSOA, CROA)	Number	473	378	413	500	500
Written Complaints Received (Debt Management)	Number	31	40	25	50	60
Compliance Examinations (UCCC)	Number	386	296	371	400	400

Debt Collection						
Workload Measure	Unit	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY16
New Licenses Issued	Number	122	126	94	105	105

License Total on June 30	Number	786	805	789	800	825
Written Complaints Received	Number	964	1035	1224	1100	1100

CORE OBJECTIVES AND PERFORMANCE MEASURES

CONSUMER CREDIT

Objective: Ensure compliance with consumer credit laws.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Open investigations and file, defend, or settle cases	130	131	126	112	130	130

Strategy: Enforcement actions and investigations come from consumer complaints, information from competitors, from staff detection of violations during compliance examinations, and publicly available advertising and information on the Internet. These actions are very important in the debt management area as it is a relatively new law. In addition, in the consumer lending and credit area, consumers often are unaware of whether particular fees are legal or if loan payments have been correctly applied.

Evaluation of Prior Year Performance: Cases and investigations have decreased only slightly largely due to the substantial time required on a few large court cases that have required significant attorney and staff time and resources.

Key Workload Indicators: Because most cases and investigations arise from consumer complaints, compliance examinations, and searching the Internet, it is difficult to predict these numbers. In addition, changes in the debt management and payday lending laws will, at best, take some time for the industry to reach compliance. There will be some companies that do not comply with statutory changes or never intend to, such as certain online companies. Finally, the relatively new compliance examination programs in many of the consumer credit areas will result in some legal cases and challenges. These numbers cannot be predicted.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Require consumer refunds	\$1,500,000	\$5,287,437	\$1,170,574	833,051	\$1,500,000	\$1,500,000

Strategy: Refunds result from overcharges and illegal charges discovered from compliance examinations, consumer complaints, searching the Internet, and from litigation. Refunds may include credits to existing balances on open accounts.

Evaluation of Prior Year Performance: Consumer refund total amounts were consistent with previous years prior to the institution of the exam authority of retail sales finance. Additionally, the examinations are resulting in more compliance with the statutes; as a result refunds have decreased.

Key Workload Indicators: Refund totals are dependent on industry compliance with state law. It generally takes several years for compliance to improve after new laws are adopted or an industry is first subject to regulation or examination.

Objective: Ensure efficient operations to benefit creditors and consumers.

Uniform Consumer Credit Code, Credit Repair, Rent-to-Own

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Investigate and resolve complaints within 60 days or less	60	41	40	39	60	60
Investigate and resolve 80% of complaints received during FY	80%	78%	78%	72%	80%	80%

Debt Management

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Investigate and resolve complaints within 60 days or less	60	16	27	43	60	60
Investigate and resolve 80% of complaints received during FY	80%	45%	57%	92%	80%	80%

Strategy: The Unit's goal was to resolve 80% of consumer complaints received in the fiscal year within an average of 60 days or less. The complaint resolution process includes complaint intake to determine jurisdiction, locating the business, obtaining a response and often additional information, business requests for extensions of time, and staff time to investigate and determine what action to take.

Evaluation of Prior Year Performance: Debt management closure time increased as well as the percent of closed complaints. The unit's staff has done an excellent job in handling the increase in complaints in addition to the significant time spent on the examination process of registrants especially in light of the amount of litigation the unit is involved in this area. UCCC has reduced the number of days needed to close a complaint. However, the percentage of complaints closed within the fiscal year has increased due to the number of complaints related to current investigations of unlicensed lenders.

Key Workload Indicators: Completion time depends on the number and complexity of consumer complaints, whether the business complies with state law, and other workload demands. Complaint numbers usually increase during economic downturns with increased delinquencies, defaults, repossessions, foreclosures, and offers to reduce debt or remove bad credit. In addition, complaints against unlicensed lenders, particularly Internet payday lenders, often increase. These lenders generally refuse to comply with state law, do not respond, and challenge our jurisdiction, requiring legal action. This substantially delays complaint resolution.

TITLE – DEBT COLLECTION

Objective: Ensure compliance with laws regulating collection agencies.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Open investigations and file, defend, or settle cases	70	81	73	67	70	70

Strategy: Enforcement actions and investigations come from consumer or collection agency client complaints, information from competitors, and from staff detection of violations in license renewal applications. Because the statute does not provide for periodic compliance examinations, complaints are the primary method to ensure compliance.

Evaluation of Prior Year Performance: The number of enforcement actions during FY 14 slightly decreased; however, it is not an indication of a future downward trend as it appears due to the time spent on larger and more complex investigations and cases, and the sheer increase in complaints having to be analyzed and processed. Despite the slight decrease in actions, those actions resulted in total fines of \$207,145.00.

Key Workload Indicators: The unit is and will to continue to be involved in the investigations of collection agencies that purchase and collect large portfolios of defaulted consumer debts from banks or credit card companies that are relying on robo-signed

affidavits as proof of debt. The scope of these investigations may expand as other debt purchaser engaged in similar debt collection practices are brought to light and will involve utilization of more of the investigator's time and unit's resources as they progress to filing of cases.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Issue cease and desist notices to unlicensed collection agencies	70	71	87	111	100	100

Strategy: Cease and desist advisory notices are issued based on information provided by consumers, competitors, and review of lawsuits filed in Colorado courts. Unlicensed collection agencies are generally offered an opportunity to become licensed if they cease collections and pay a penalty for prior unlicensed collections.

Evaluation of Prior Year Performance: This number is generally consistent with past years.

Key Workload Indicators: These numbers are typically consistent over the years. Colorado's licensing requirements are clear and readily accessible to collection agencies.

Objective: Ensure efficient operations to benefit collection agencies and protection of consumers.

Performance Measure	Target	FY 12 Actual	FY 13 Actual	FY 14 Actual	FY 15 Estimate	FY 16 Request
Investigate and resolve complaints within 60 days or less	60	44	56	59	60	60
Investigate and resolve 80% of complaints received during FY	80%	80%	91%	76%	80%	80%

Strategy: The Unit's goals is to resolve consumer complaints within an average of 60 days or less and resolve 80% of written complaints received during a fiscal year. These goals are based on receipt of 1,000 or fewer written complaints. The complaint resolution process includes complaint intake to determine jurisdiction, locating the collection agency, obtaining a response and often additional information, collection agency requests for extensions of time, and staff time to investigate and determine what action to take.

Evaluation of Prior Year Performance: Despite the decrease in percentage of complaints resolved within the fiscal year, the Unit's performance was good. The large increase in number of complaints the Unit had to process and resolve was beyond the Unit's goal measure of receiving 1000 or fewer complaints, as the Unit received 1224 complaints during the fiscal year. Additionally, more staff resources were used on larger and complex investigations and examinations.

Key Workload Indicators: Resolution time depends on the number and complexity of consumer complaints, whether complaints reveal violations of the law, whether violations can be resolved informally or require administrative or legal action, and whether staff time must be devoted to other activities such as litigation.

SCHEDULE 2 - PROGRAM SUMMARY

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Actual FY 13		Actual FY 14		Approp FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
CONS. PROTECT. & ANTI-TRUST	2,457,316	23.6	2,790,886	23.8	2,328,660	26.0	2,750,155	26.2	2,646,731	27.2
General Fund	1,082,843		1,386,260		1,106,670		1,290,274		1,208,089	
General Fund Exempt	-		-		-		-		-	
Cash Fund	1,107,469		1,100,990		961,411		1,165,523		1,152,316	
Reappropriated Funds	267,004		303,637		260,579		294,358		286,326	
Federal Funds										

SCHEDULE 3 - PERSONAL SERVICES PROGRAM DETAIL

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Actual FY 13		Actual FY 14		Approp FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
I. POSITION DETAIL										
Deputy Attorney General	124,728	1.0	143,436	1.0			146,328	1.0	146,328	1.0
First Assistant Attorney General	209,925	2.0	241,833	1.9			253,680	2.0	253,680	2.0
Senior Assistant Attorney General	67,863	0.7	123,826	1.2			101,004	1.0	101,004	1.0
Assistant Attorney General	460,145	6.0	585,094	6.7			681,588	7.4	681,588	7.4
Compl Investigator I	55,597	1.0	58,320	1.0			60,132	1.0	60,132	1.0
Criminal Investigator II	64,800	1.0	215,941	3.0			224,760	3.0	224,760	3.0
Criminal Investigator I										
Compl Investigator II	182,154	2.6	67,488	1.0			70,416	1.0	70,416	1.0
Legal Assistant II	204,965	3.5	191,217	3.0			244,036	3.8	244,036	3.8
Admin Asst II	71,370	1.8	78,825	1.9			84,456	2.0	84,456	2.0
General Professional IV	96,132	1.3					-			
General Professional V			76,772	1.1			80,148	1.0	80,148	1.0
General Professional III	43,386	0.7								
General Professional II							46,740	1.0	46,740	1.0
Program Assistant II	52,176	1.0	53,808	1.0			55,596	1.0	55,596	1.0
Program Assistant I	49,176	1.0	50,160	1.0			51,828	1.0	51,828	1.0
TOTAL POSITION DETAIL	1,682,417	23.6	1,886,719	23.8			2,100,712	26.2	2,100,712	26.2

SCHEDULE 3 - PROGRAM DETAIL

Department of Law				CONSUMER PROTECTION & ANTI-TRUST						
Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
(I.A.) CONTINUATION FTE SALARY COST	1,682,417	23.6	1,886,719	23.8			2,100,712	26.2	2,100,712	26.2
(Permanent FTE by position) Continuation Salary Subtotal										
(I.B.) OTHER PERSONAL SERVICES										
PERA on Continuation Subtotal	168,402		193,565				213,222		213,222	
Medicare on Continuation Subtotal	23,658		27,670				30,460		30,460	
Non-Base building Performance Awards							-		-	
Part-Time/Temporary Salaries	16,929		90,321				-		-	
Contractual Services	24,069		2,892				2,500		2,500	
Overtime Pay	2,143		-							
Sick Leave Conversion										
Termination/Retirement Payouts	10,434		1,119							
Employment Security Payments	1,398		-							
Furlough Days	0		-							
Other Employee Benefits	5744		5,172				5,200		5,200	
Vacancy Savings									-	
SUBTOTAL	252,777		320,739				251,383		251,383	
(I.C.) PERSONAL SERVICE SUBTOTAL= A+B	1,935,194	23.6	2,207,459	23.8			2,352,095	26.2	2,352,095	26.2
(I.D.) POTS EXPENDITURES										
Health/Life/Dental	161,313		169,219				175,318			
Salary Survey Non Add			222,995				-			
Merit Pay Non Add			14,227							
One Time Performance Awards			709							
Short Term Disability	2,900		3,568				4,622			
SB 04.257 A.E.D.	51,133		68,386				84,028			
SB 06.235 S.A.E.D.	43,988		61,645				78,777			
Other										
[] Indicates a Non-add										
(I.E.) BASE PERSONAL SERVICES TOTAL = C+D	2,194,528	23.6	2,510,985	23.8			2,694,840	26.2	2,352,095	26.2
General Fund							1,259,386		1,118,666	
General Funds Exempt										
Cash Funds							1,152,901		978,273	
Reappropriated Funds							282,553		255,156	
(I.F.) DIFFERENCE= II-I.E.							-		-	
(I.G.) Decision Item: #3 Tobacco Litigation Legal Assistant										
General Fund										
Cash Funds										
Reappropriated Funds										

SCHEDULE 3 - PROGRAM DETAIL

Department of Law					CONSUMER PROTECTION & ANTI-TRUST					
Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
II. PERSONAL SERVICES REQUEST TOTAL	2,194,528	23.6	2,510,985	23.8			2,694,840	26.2	2,352,095	26.2
General Fund	965,592		1,255,492				1,259,386		1,118,666	
General Fund Exempt	-		-				-			
Cash Funds	1,003,372		971,476				1,152,901		978,273	
Reappropriated Funds	225,564		284,016				282,553		255,156	
Federal Funds	-		-						-	

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
OPERATING EXPENSES										
1930 1930 - Purchased Services - Litigation	51,944		80,124				-		-	
2170 Waste Disposal Services	511		-				-		-	
2230 Equipment Contract Maintenance	78		113				48		48	
2231 ADP Equip Maint/Repair Services	2,548		3,414				-		-	
2232 Software Upgrades	3,407		2,519				-		-	
2251 Rental/Lease Motor Pool Veh	4,774		3,540				-		-	
2252 Leased Vehicle - Variable	1,084		1,842				2,047		2,047	
2253 Rental of Equipment	-		-						-	
2254 Rental of Motor Vehicles	-		-						-	
2255 Rental of Building	64,148		-						-	
2258 Parking	2,640		2,430				2,640		2,640	
2259 Parking Fee Reimbursement	70		20						-	
2268 Rental of IT Software Network			953							
2510 In State Travel	175		-				50		50	
2511 IS Common Carrier Fares	-		-						-	
2512 IS Personal Travel Per Diem	268		-				100		100	
2513 IS Pers Vehicle Reimbursement	328		70				-		-	
2514 IS State Owned Aircraft	-		-						-	
2515 State-Owned Vehicle Charge	-		-						-	
2520 IS Travel Non Employee	149		-						-	
2522 IS Non Employee Per Diem	-		-						-	
2530 Out of State Travel	2,538		559				650			
2531 OS Common Carrier Fares	9,868		809				1,200			
2532 OS Personal Travel Per Diem	20,652		5,036				2,125			
2533 OS Pers Vehicle Reimbursement	-		-						-	
2610 Advertising	-		-						-	
2611 Public Relations	-		-						-	
2630 Comm Service Div of Telecom	14,547		1,507				1,645		1,645	
2631 Comm Svcs from Outside Sources	2,659		7,205				7,450		7,450	
2640 GGCC Billings-Purchased Serv			274							
2641 Other ADP Billing	8,560		11,837				-		-	
2650 OIT Purchased Svs	-		-							
2660 Insurance	3,691		4,198				-		-	
2680 Contract Printing	14,106		9,598				9,652		9,652	
2681 Photocopy Reimbursement	-		-						-	

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
2710 Purchased Medical Services	-		-						-	
2810 Freight & Storage	-		-						-	
2820 Other Purchased Services	-		-				-		-	
2830 Office Moving-Pur Services	-		-						-	
2831 Storage Purchased Svs	31		-						-	
3110 Other Supplies and Materials	-		46						-	
3112 Automotive Supplies	-		-						-	
3113 Clothing and Uniform Allowance	-		-						-	
3114 Custodial	-		-						-	
3115 DP Supplies	109		-				-		-	
3116 Purchased/Leased Software	2,053		8,478				-		-	
3117 Educational	-		21				-		-	
3118 Food and Food Service Supplies	-		-						-	
3120 Books & Subscriptions	14,555		15,721				8,500		3,584	
3121 Office Supplies	8,988		12,785				8,589		8,589	
3123 Postage	5,998		5,667				5,969		5,969	
3124 Printing/Copy Supplies	322		-						-	
3126 Repair & Maintenance Supplies	80		-						-	
3128 Non-Capitalized Equipment	(9)		815						-	
3131 Noncapitalized Bldg Materials	-		286						-	
3132 Non- Cap Office Furn-Off Systems	-		208						-	
3140 Non-Capitlized IT - PC's	4,683		6,353						-	
3141 Non-Capitalized IT Servers	-		147						-	
3142 Non-Capitalized IT Network	3,465		91						-	
3143 Non-Capitalized IT Other	2,495		1,816						-	
3146 Non-Capital. IT Purchsd. Server Software	-		-						-	
3940 Electricity	-		-						-	
3950 Gasoline	-		-						-	
3970 Natural Gas	-		-						-	
4111 Prizes and Awards	-		-						-	
4140 Dues & Memberships	(225)		324						-	
4151 Interest - Late Payments	-		-						-	
4170 Miscellaneous Fees	-		-						-	
4180 Official Functions	80		854				450		450	
4220 Registration Fees	3,334		325				4,200		4,200	
4221 Other Educational - W2 RPT	-		-						-	
6140 Leasehold Improv - Direct Purch	-		-						-	
6212 IT Servers Direct Purchase	277		1,323						-	
6216 IT Servers SW Direct Purchase	1,401		-						-	
EBJJ Law to Judicial	6,404		88,594						-	

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
Operating Expense Subtotal:	262,788		279,902				55,315		46,424	
OPERATING EXPENSE SUBTOTAL:	262,788		279,902				55,315		46,424	
General Fund	117,251		130,767				30,888		24,876	
General Fund Exempt	-		-				-		0	
Cash Funds	104,097		129,514				12,622		9,743	
Reappropriated Funds	41,440		19,621				11,805		11,805	
Potted Operating Expenses										
Workers' Compensation							-			
Vehicle Leased Expense							-			
Capital Complex Lease Space							-			
Leased Space							-			
IT Asset Maintenance							-			
Communication Service Payments							-			
ADP Capital Outlay							-			
CLE Registration Fees							-			
Building Security							-			
Total							-			
General Fund							-			
Cash Funds							-			
Reappropriated Funds							-			
Rollforwards										
Reappropriated Funds										
DECISION ITEM REQUESTS:										
Dec Item - Tobacco Litigation Legal Assistant									80,389	1.0
General Fund										
Cash Funds									80,389	1.0
Reappropriated Funds										
Dec Item - CP and Antitrust Operating and Litigation									167,823	
General Fund									64,547	
Cash Funds									83,911	
Reappropriated Funds									19,365	
									-	
General Fund									-	
Cash Funds										
Reappropriated Funds										

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
TOTAL CONSUMER PROTECTION	2,457,316	23.6	2,790,886	23.8			2,750,155	26.2	2,646,731	27.2
General Fund	1,082,843		1,386,260				1,290,274		1,208,089	
General Fund Exempt	-		-						-	
Cash Funds	1,107,469		1,100,990				1,165,523		1,152,316	
Reappropriated Funds	267,004		303,637				294,358		286,326	
RECONCILIATION OF FUNDS										
Long Bill Appropriation	2,167,295	26.0	2,046,520	25.0	2,328,660	26.0	2,328,660	26.0	2,328,660	26.2
FY 16 Decision Item:									-	0.0
Annualizatoion of FY 15 Decision Item					0		-		(1,230)	
Pay date Shift bill for biweekly employees	2,919									
DI#3 Tobacco Litigaiton Legal Assistant									80,389	1.0
DI #5 Cpand Antitrust Operating and Litigation									167,823	
Supplemental	-		-							
SB09-192										
Allocated POTS:										
Salary Survey Classified			31,602				23,418		23,418	
Salary Survey NonClassified			191,393				27,381		27,381	
Performance Pay Classified			11,249				7,150		7,150	
Performance Pay NonClassified			2,978				13,140		13,140	
Health/Life/Dental	119,868		159,224				175,006			
Short Term Disability	2,795		4,223				6,260			
SB 04.257 A.E.D.	57,886		69,624				90,244			
SB 06.235 S.A.E.D.	49,606		66,606				78,896			
Worker's Compensation	3,710		4,087							
Vehicle Lease Payments			4,439				-			
Capital Complex Lease Space/CARR	64,172		245,023				-			
Lease Space	-						-			
ADP Capital Outlay	-		-				-			
Communication Service Payments	1,647		1,394				-			
IT Asset Maintenance	13,275		13,275				-			
CLE Registration Fees	4,125		4,125				-			
Building Security	7,115		-				-			
Year-End Transfer										
Rollforward from previous FY							-			
Rollforward to subsequent FY										
Overexpenditure/(Reversion) - GF										
Lapsed Appropriation Reappropriated Fund			(1,740)							
Lapsed Appropriation Cash Fund	(37,097)	(2.4)	(63,136)	(1.2)						
TOTAL RECONCILIATION	2,457,316	23.6	2,790,886	23.8			2,750,155	26.0	2,646,731	27.2

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
TOTALS	2,457,316	23.6	2,790,886	23.8	2,328,660	26.0	2,750,155	26.2	2,646,731	27.2
General Fund	1,082,843		1,386,260		1,106,670		1,290,274		1,208,089	
General Fund Exempt	-		-				-		-	
Cash Funds	1,107,469		1,100,990		961,411		1,165,523		1,152,316	
Reappropriated Funds	267,004		303,637		260,579		294,358		286,326	

SCHEDULE 4 - SOURCE OF FINANCING - DIRECT REVENUES

Department of Law

CONSUMER PROTECTION & ANTI-TRUST

Item	Fund Number	Actual	Actual	Approp	Estimate	Request
		FY 2013	FY 2014	FY 2015	FY 2015	FY 2016
Schedule 3 Total		2,457,316	2,790,886	2,328,660	2,750,155	2,646,731
General Fund		1,082,843	1,386,260	1,106,670	1,290,274	1,208,089
General Fund Exempt		-	-	-	-	-
Cash Funds		1,107,469	1,100,990	961,411	1,165,523	1,152,316
Reappropriated Funds		267,004	303,637	260,579	294,358	286,326
Federal Funds		-	-	-	-	-
Cash Funds		1,107,469	1,100,990	961,411	1,165,523	1,152,316
Dept of Local Affairs (Manufactured Home Fund)		20,668	20,668	-	-	-
No Call Fund Source		25,719	16,271	25,719	25,719	12,000
146 Custodial Fund		839,401	932,993	773,832	978,208	896,518
Tobacco Litigation Defense Account		139,026	131,058	161,860	176,596	243,798
UCCC Custodial		82,655	-	-	-	-
Reappropriated Funds		267,004	303,637	260,579	294,358	286,326
Custodial Fund Balance		-	-	-	-	-
Tobacco Litigation Defense Account		-	-	-	-	-
UCCC Custodial		-	-	-	-	-
Division of Real Estate		267,004	303,637	260,579	294,358	286,326

SCHEDULE 2 - PROGRAM SUMMARY

Department of Law							Consumer Credit Unit			
Item	Actual FY 13		Actual FY 14		Approp FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
CONS. PROTECT. & ANTI-TRUST	1,836,680	19.2	2,068,463	19.8	1,616,183	20.0	1,926,638	20.0	1,674,691	20.0
General Fund	-		-		-		-		-	
General Fund Exempt	-		-		-		-		-	
Cash Fund	1,836,680		2,068,463		1,616,183		1,926,638		1,674,691	
Reappropriated Funds	-		-		-		-		-	
Federal Funds										

SCHEDULE 3 - PERSONAL SERVICES PROGRAM DETAIL

Department of Law

Consumer Credit Unit

Item	Actual FY 13		Actual FY 14		Approp FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
I. POSITION DETAIL										
First Assistant Attorney General	87,665	0.8	123,420	1.0			126,060	1.0	126,060	1.0
Senior Assistant Attorney General	164,045	2.0	185,338	1.9			97,272	1.0	97,272	1.0
Assistant Attorney General	53,961	0.7	95,224	1.1			186,564	2.0	186,564	2.0
Financial Credit Examiner IV	89,640	1.0	93,348	1.0			96,252	1.0	96,252	1.0
Financial Credit Examiner III	109,771	1.4	153,288	2.0			158,412	2.0	158,412	2.0
Financial Credit Examiner II	257,414	4.1	187,428	3.0			194,136	3.0	194,136	3.0
Financial Credit Examiner I	60,170	1.1	110,820	2.0			114,504	2.0	114,504	2.0
Compl Investigator I	109,188	2.0	113,148	2.0			116,676	2.0	116,676	2.0
Legal Assistant II	49,044	1.0	98,037	1.6			131,016	2.0	131,016	2.0
Legal Assistant I	34,261	0.7	15,204	0.3						
Admin Asst II	57,790	1.5	47,659	1.2			41,856	1.0	41,856	1.0
Program Assistant I	150,612	3.0	140,625	2.8			154,428	3.0	154,428	3.0
TOTAL POSITION DETAIL	1,223,561	19.2	1,363,539	19.8			1,417,176	20.0	1,417,176	20.0

SCHEDULE 3 - PROGRAM DETAIL

Department of Law						Consumer Credit Unit				
Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
(I.A.) CONTINUATION FTE SALARY COST	1,223,561	19.2	1,363,539	19.8			1,417,176	20.0	1,417,176	20.0
(Permanent FTE by position)										
Continuation Salary Subtotal										
(I.B.) OTHER PERSONAL SERVICES										
PERA on Continuation Subtotal	120,973		137,179				143,843		143,843	
Medicare on Continuation Subtotal	16,116		19,631				20,549		20,549	
Non-Base building Performance Awards			1,701				342		-	
Part-Time/Temporary Salaries	0		24,581				-		-	
Contractual Services	17,182		2,666				29,154			
Overtime Pay	-		6							
Board Member Compensation	-		400							
Sick Leave Conversion										
Termination/Retirement Payouts	64,848		13,493							
Employment Security Payments	0		11,781							
Furlough Days	0		-							
Other Employee Benefits	3359.5		3,632				3,500		3,500	
Other										
Special Bills										
SUBTOTAL	222,480		215,069				197,388		167,892	
(I.C.) PERSONAL SERVICE										
SUBTOTAL= A+B	1,446,040	19.2	1,578,608	19.8			1,614,564	20.0	1,585,068	20.0
(I.D.) POTS EXPENDITURES										
Health/Life/Dental	135,201		142,806				142,806			
Salary Survey Non Add			91,069				-			
Merit Pay Non Add			14,862				-			
Short Term Disability	2,092		2,591				3,118			
SB 04.257 A.E.D.	38,118		48,642				56,687			
SB 06.235 S.A.E.D.	32,749		43,908				53,144			
Other										
[] Indicates a Non-add										
(I.E.) BASE PERSONAL SERVICES	1,654,201	19.2	1,816,555	19.8			1,817,175	20.0	1,585,068	20.0
TOTAL = C+D										
General Fund							-		-	
General Funds Exempt										
Cash Funds							1,817,175		1,585,068	
Reappropriated Funds							-		-	
(I.F.) DIFFERENCE= II-I.E.							-		-	
(I.G.) REQUEST YEAR DECISION ITEMS										
General Fund										

SCHEDULE 3 - PROGRAM DETAIL

Department of Law							Consumer Credit Unit			
Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
Cash Funds										
Reappropriated Funds										
II. PERSONAL SERVICES REQUEST TOTAL	1,654,201	19.2	1,816,555	19.8			1,817,175	20.0	1,585,068	20.0
General Fund	-		-				-		-	
General Fund Exempt	-		-				-		-	
Cash Funds	1,654,201		1,816,555				1,817,175		1,585,068	
Reappropriated Funds	-		-				-		-	
Federal Funds	-		-				-		-	

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

Consumer Credit Unit

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
OPERATING EXPENSES										
1930 Purchased Services - Litigation	23,337		18,881				28,915		9,075	
2170 Waste Disposal Services	215		456				-		-	
2230 Equipment Contract Maintenance	169		183				83		83	
2231 ADP Equip Maint/Repair Services	3,521		2,895				-		-	
2232 Software Upgrades	7,395		5,468				-		-	
2240 Motor Vehicle Repair/Maintenance	-		165				-		-	
2251 Rental/Lease Motor Pool Veh	10,201		7,690							
2252 Leased Vehicle - Variable	7,023		8,806				10,250		10,250	
2253 Rental of Equipment	-		-				-		-	
2254 Rental of Motor Vehicles	50		31				518		518	
2255 Rental of Building	57,625		2,916				-		-	
2258 Parking	-		-				-		-	
2259 Parking Fee Reimbursement	13		15				-		-	
2268 Rental of IT Software - Network			2,068							
2510 In State Travel	10		-				-		-	
2511 IS Common Carrier Fares	-		-				-		-	
2512 IS Personal Travel Per Diem	1,287		964				2,512		2,512	
2513 IS Pers Vehicle Reimbursement	1,461		486				1,130		1,130	
2514 IS State Owned Aircraft	-		-				-		-	
2515 State-Owned Vehicle Charge	-		-				-		-	
2520 IS Travel Non Employee	-		36				85		85	
2522 IS Non Employee Per Diem	-		27				45		45	
2523 IS Non Employee Personal Vehicle Reimb	-		367				420		420	
2530 Out of State Travel	535		293				2,856		2,856	
2531 OS Common Carrier Fares	2,416		1,099				6,700		6,700	
2532 OS Personal Travel Per Diem	1,645		273				9,450		9,450	
2533 OS Pers Vehicle Reimbursement	-		-				-		-	
2610 Advertising	-		-				-		-	
2611 Public Relations	-		-				-		-	
2630 Comm Service Div of Telecom	5,517		30				11,520		11,520	
2631 Comm Svcs from Outside Sources	795		843				1,984		1,984	
2641 Other ADP Billing	1,198		2,317				5,474		5,474	
2650 OIT Purchased Services	-		-							
2660 Insurance	3,164		3,359				-		-	
2680 Contract Printing	10,684		2,273				7,854		7,854	
2681 Photocopy Reimbursement	-		-				-		-	
2710 Purchased Medical Services	-		-				-		-	
2810 Freight & Storage	-		-						-	
2820 Other Purchased Services	10		6,012				25		25	
2830 Office Moving-Pur Services	-		-				-		-	
2831 Storage Purch Svcs	67		-							

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

Consumer Credit Unit

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
3110 Other Supplies and Materials	-		30				-		-	
3112 Automotive Supplies	-		-				-		-	
3113 Clothing and Uniform Allowance	-		-				-		-	
3114 Custodial	-		-				-		-	
3115 DP Supplies	74		-				450		450	
3116 Purchased/Leased Software	441		10,801				115		115	
3117 Educational	-		45				-		-	
3118 Food and Food Service Supplies	-		-				-		-	
3120 Books & Subscriptions	7,083		5,694				2,050		2,050	
3121 Office Supplies	4,867		6,468				4,020		4,020	
3123 Postage	6,571		7,779				7,582		7,582	
3124 Printing/Copy Supplies	404		278							
3126 Repair and Maintenance Supplies			174							
3128 Non-Capitalized Equipment	2,015		514				-		-	
3131 Noncapitalized Bldg Materials	-		42				-		-	
3132 Non- Cap Office Furn-Off Systems	-		450				-		-	
3140 Non-Capitlized IT - PC's	3,421		2,498				-		-	
3141 Non-Capitalized IT Servers	-		319				-		-	
3142 Non-Capitalized IT Network	59		198							
3143 Non-Capitalized IT Other	1,622		5,868				-		-	
3146 Non-Capital. IT Purchsd. Server Software	-		-				-		-	
3940 Electricity	-		-				-		-	
3950 Gasoline	-		-				-		-	
3970 Natural Gas	-		-				-		-	
4111 Prizes and Awards	-		-				-		-	
4140 Dues & Memberships	847		3,368				4,500		4,500	
4151 Interest - Late Payments	-		-				-		-	
4170 Miscellaneous Fees	-		-				-		-	
4180 Official Functions	356		283				700		700	
4220 Registration Fees	422		1,400				225		225	
4221 Other Educational - W2 RPT	-		-				-		-	
6140 Leasehold Improv - Direct Purch	-		-				-		-	
6210 ADP Equipment	-		-				-		-	
6212 IT Servers Direct Purchase	601		2,871				-		-	
6214 IT Other- Direct Purchase	12,164		-				-		-	
6216 IT Server SW Direct Purchase	904		-							
ABJE Law to Judicial	2,287		134,875							
Forced Savings										

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

Consumer Credit Unit

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
Operating Expense Subtotal:	182,479		251,909				109,463		89,622	
OPERATING EXPENSE SUBTOTAL:	182,479		251,909				109,463		89,622	
General Fund							0		0	
General Fund Exempt	-		-				-		0	
Cash Funds	182,479		251,909				109,463		89,622	
Reappropriated Funds							0		0	
Potted Operating Expenses										
Workers' Compensation							-			
Vehicle Leased Expense							-			
Capital Complex Lease Space							-			
Leased Space							-			
IT Asset Maintenance							-			
Communication Service Payments							-			
ALJ							-			
CLE Registration Fees							-			
Building Security							-			
Total							-			
General Fund							-			
Cash Funds							-			
Reappropriated Funds							-			
DECISION ITEM REQUESTS										
General Fund									-	
Cash Funds									-	
Reappropriated Funds									-	
General Fund									-	
Cash Funds									-	
Reappropriated Funds									-	
TOTAL CONSUMER PROTECTION	1,836,680	19.2	2,068,463	19.8			1,926,638	20.0	1,674,691	20.0
General Fund	-		-				-		-	
General Fund Exempt	-		-				-		-	
Cash Funds	1,836,680		2,068,463				1,926,638		1,674,691	
Reappropriated Funds	-		-				-		-	

SCHEDULE 3 - OPERATING PROGRAM DETAIL

Department of Law

Consumer Credit Unit

Item	Actual FY 13		Actual FY 14		Estimate FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
RECONCILIATION OF FUNDS										
Long Bill Appropriation	1,521,916	20.0	1,512,150	20.0	1,616,183	20.0	1,616,183	20.0	1,616,183	20.0
PERA Adjustment back to 10.15%									-	
PERA SB 11-76 @ 7.65%							-			
<i>Supplemental</i>										
<i>Annualization of FY 13 DI</i>										
Salary Survey Classified			24,916				38,791		38,791	
Salary Survey NonClassified			66,153				5,581		5,581	
Merit Classified			10,092				9,606		9,606	
Merit Non Classified			4,770				4,530		4,530	
Health/Life/Dental	127,731		123,730				141,324			
Short Term Disability	1,783		2,583				3,112			
SB 04.257 A.E.D.	37,440		48,948				53,538			
SB 06.235 S.A.E.D.	32,176		45,380				53,973			
Worker's Compensation	3,177		3,406							
Vehicle Lease Payments	10,677		8,314							
Capital Complex Lease Space/CARR Bldg	65,004		188,087							
Lease Space	3,052		3,052							
ALJ	1,135		4,362							
IT Asset Maintenance	28,813		37,895							
CLE Registration Fees	1,500		1,500							
Building Security	6,099									
Year-End Transfer										
Rollforward from previous FY							-			
Overexpenditure/(Reversion) - GF										
Lapsed Appropriation Reappropriated Fund										
Lapsed Appropriation Cash Fund	(3,823)	(0.8)	(16,875)	(0.2)						
TOTAL RECONCILIATION	1,836,680	19.2	2,068,463	19.8			1,926,638	20.0	1,674,691	
TOTALS	1,836,680	19.2	2,068,463	19.8	1,616,183	20.0	1,926,638	20.0	1,674,691	20.0
General Fund	-		-		-		-		-	
General Fund Exempt	-		-		-		-		-	
Cash Funds	1,836,680		2,068,463		1,616,183		1,926,638		1,674,691	
Reappropriated Funds	-		-		-		-		-	

SCHEDULE 4 - SOURCE OF FINANCING - DIRECT REVENUES

Department of Law

Consumer Credit Unit

Item	Fund Number	Actual	Actual	Approp	Estimate	Request
		FY 2013	FY 2014	FY 2015	FY 2015	FY 2016
Schedule 3 Total		1,836,680	2,068,463	1,616,183	1,926,638	1,674,691
General Fund		-	-	-	-	-
General Fund Exempt		-	-	-	-	-
Cash Funds		1,836,680	2,068,463	1,616,183	1,926,638	1,674,691
Reappropriated Funds		-	-	-	-	-
Federal Funds		-	-	-	-	-
Cash Funds		1,836,680	2,068,463	1,616,183	1,926,638	1,674,691
Collection Agency Cash Fund		447,294	543,869	555,700	670,490	586,255
UCCC Cash Fund		1,389,386	1,524,594	1,060,483	1,256,148	1,088,436

SCHEDULE 2 - PROGRAM SUMMARY

Department of Law

INDIRECT COST ASSESSMENT - CONSUMER PROTECTION

Item	Actual FY 13		Actual FY 14		Approp FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
INDIRECT COST ASSESSMENT	471,352		467,308		456,857		456,857	-	429,805	-
General Fund Exempt										
General Fund										
Cash Funds	434,140		427,253		417,698		417,698		393,988	
Reappropriated Funds	37,212		40,055		39,159		39,159		35,817	

SCHEDULE 3 - PROGRAM DETAIL

Department of Law

INDIRECT COST ASSESSMENT - CONSUMER PROTECTION

Item	Actual FY 13		Actual FY 14		Approp FY 15		Estimate FY 15		Request FY 16	
	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE	Total Funds	FTE
INDIRECT COST ASSESSMENT	471,352		467,308		456,857		456,857		429,805	
Cash Funds	434,140		427,253		417,698		417,698		393,988	
Reappropriated Funds	37,212		40,055		39,159		39,159		35,817	
INDIRECT COST ASSESSMENT	471,352		467,308		456,857		456,857		429,805	
Cash Funds	434,140		427,253		417,698		417,698		393,988	
Reappropriated Funds	37,212		40,055		39,159		39,159		35,817	
RECONCILIATION OF FUNDS										
Long Bill Appropriation	471,352		467,308				456,857			
Supplemental Appropriation										
Lapsed Spending Authority CF	-		-							
TOTAL RECONCILIATION	471,352		467,308				456,857			

SCHEDULE 4 - SOURCE OF FINANCING - DIRECT REVENUES

Department of Law

INDIRECT COST ASSESSMENT - CONSUMER PROTECTION

Item	Fund Number	Actual	Actual	Approp	Estimate	Request
		FY 2013	FY 2014	FY 2015	FY 2015	FY 2016
Schedule 3 Total		471,352	467,308	456,857	456,857	429,805
General Funds						
General Funds Exempt						
Cash Funds		434,140	427,253	417,698	417,698	393,988
Reappropriated Funds		37,212	40,055	39,159	39,159	35,817
Cash Funds		434,140	427,253	417,698	417,698	393,988
146 Department Custodials Funds		161,252	160,219	156,637	156,637	155,207
DOLA-Manuf Housing Fund		-	-		-	-
No-Call Fund					-	-
Tobacco Litigation Defense Fund		12,404	-		-	-
Collection Agency Board Fund		68,222	64,533	91,371	91,371	83,573
UCCC Custodial Fund		12,404	-	-	-	-
Uniform Consumer Credit Code fund		179,858	202,501	169,690	169,690	155,207
Reappropriated Funds		37,212	40,055	39,159	39,159	35,817
Department Custodials Funds		-	-			
Collection Agency Board Fund		-	-			
Tobacco Litigation Defense Fund		-	-			
UCCC Custodial Fund		-	-			
UCCC Fund Balance		-	-			
Division of Real Estate Cash Fund		37,212	40,055	39,159	39,159	35,817
Federal Funds						